

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NEWREZ LLC d/b/a SHELLPOINT
MORTGAGE SERVICING,

Plaintiff,

v.

ALLIANT NATIONAL TITLE
INSURANCE COMPANY and PATE
& ASSOCIATES, LLC,

Defendants.

CASE NO. _____

DEFENDANT'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332 and 1441, *et seq.*, Defendant Alliant National Title Insurance Company respectfully removes this lawsuit (Civil Action No. 2021CV355151 from the Superior Court of Fulton County to the United States District Court for the Northern District of Georgia, Atlanta Division.

This removal is supported by the following:

1.

This Notice of Removal is filed within thirty (30) days after service of the Plaintiffs' Complaint on Defendant and is, therefore, filed timely pursuant to 28

U.S.C. § 1446(b). Plaintiff's Complaint was served on Defendant Alliant on October 6, 2021.

2.

This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1332.

3.

Defendant may remove this case to this Court pursuant to 28 U.S.C. §§ 1441 and 1332 in that the case is a civil action in which the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs, and is an action between citizens of different states.

4.

Plaintiff is a foreign limited liability company organized under the laws of the state of Delaware (Complaint ¶ 1).

5.

Defendant Alliant is a foreign corporation organized in the laws of Colorado. (Complaint ¶ 2).

6.

Defendant Patel & Associates, LLC is a Georgia limited liability company with its principal place of business in Fulton County, Georgia. (See Complaint ¶ 3).

7.

Accordingly complete adversity of citizenship exists between the Plaintiff and Defendants.

8.

Copies of all pleadings in the Fulton County Superior Court action are attached hereto as Exhibit 1.

WHEREFORE, Defendant Alliant does hereby give notice of its removal to the United States Court for the Northern District of Georgia Atlanta division.

This 3rd day of November, 2021.

WEISSMAN PC

/S/ JEFFREY H. SCHNEIDER

Jeffrey H. Schneider
Georgia Bar No. 629545

3500 Lenox Road, 4th Floor
One Alliance Center
Atlanta, Georgia 30326
404-926-4500
jeffs@weissman.law

*Attorneys for Defendant Alliant National Title
Insurance Company*

20119.901

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

WILLIAM R. CHEEK, et al.,

Plaintiffs,

v.

OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY,

Defendant.

CASE NO. _____

CERTIFICATE OF COMPLIANCE WITH LR 7.1D, N.D. GA

Counsel certifies that this filing complies with font and point selections approved by the Court in Local Rule 5.1 and is prepared with Times New Roman 14-point font.

This 3rd day of November, 2021.

WEISSMAN PC

3500 Lenox Road, 4th Floor
One Alliance Center
Atlanta, Georgia 30326
404-926-4500
jeffs@weissman.law

20119.901

/S JEFFREY H. SCHNEIDER
Jeffrey H. Schneider
Georgia Bar No. 629545
*Attorneys for Defendant Alliant National
Title Insurance Company*